

EXHIBIT 12

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Grant Johnson,

Plaintiff,

Civil Action

Docket No. 1:22-cv-10861

v.

Esports Entertainment Group, Inc.,

Defendant.

**PLAINTIFF'S RESPONSES TO DEFENDANT'S
SECOND SET OF DOCUMENT REQUESTS**

1. All documents and communications concerning employment agreements between Johnson and Esports at any time, including all versions of each employment agreement and any amendments thereto.

RESPONSE:

Plaintiff is producing documents responsive to this request.

2. All documents and communications concerning Johnson's claim for defamation.

RESPONSE:

Plaintiff is producing documents responsive to this request.

3. All documents and communications concerning Johnson's claim that he suffered damages as a result of the alleged defamation.

RESPONSE:

Plaintiff is producing documents responsive to this request.

4. All documents and communications relating to the amount of shares in Esports owned by Johnson between January 2020 and the present.

RESPONSE:

Plaintiff objects that the information sought in this request is publicly available in Defendant's own SEC filings and can be obtained by Defendant with an EDGAR search as readily as it could be obtained by Plaintiff.

5. All documents and communications relating to the amount of shares in Esports owned by any of Johnson's Affiliates, including any trusts, between January 2020 and the present.

RESPONSE:

Plaintiff objects that the information sought in this request is publicly available in Defendant's own SEC filings and can be obtained by Defendant with an EDGAR search as readily as it could be obtained by Plaintiff.

6. All documents and communications with and/or concerning David Williams.

RESPONSE:

Plaintiff is producing documents responsive to this request.

7. All documents and communications with and/or concerning Wakas Khatri.

RESPONSE:

Plaintiff is producing documents responsive to this request.

8. All documents and communications with and/or concerning Magnus Leppaniemi.

RESPONSE:

Plaintiff objects that this request is overly broad, unduly burdensome, not relevant, and not proportional to the facts at issue in this case. This request does not give a subject matter of the requested documents and communications. A request for "[a]ll documents and communications" with another individual previously at the company, by its own terms does not seek documents relevant to this case and would potentially involve an enormous amount of material with no relevance to Plaintiff's claim, Defendant's affirmative defenses, or either party's allegations.

9. All documents and communications concerning the price of Esports shares.

RESPONSE:

Plaintiff will produce any responsive documents in his possession, custody or control.

10. All documents and communications concerning Esports with marketing companies and public relations companies.

RESPONSE:

Plaintiff will produce any responsive documents in his possession, custody or control.

11 . All communications with Alan Frank and Evan Frank unrelated to this litigation that are not privileged.

RESPONSE:

Plaintiff objects that this request is not relevant because the request literally defines the documents sought as "unrelated to this litigation". A discovery request that defines the material sought as "unrelated to this litigation" by its own terms is unrelated to this litigation. The request also seeks communications between Plaintiff and his current litigation counsel. While the request qualifies itself with the language "... that are not privileged", in practice any communication between Plaintiff and his own counsel is likely to be privileged.

Respectfully submitted,

/s/ Alan L. Frank

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